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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$25,000.00 IN
U.S. CURRENCY,

15 Defendant.
16

1:22-MC-00035-JLT

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Jesus
18 Pedro Maldonado Ceja (“claimant”), by and through their respective counsel, as follows:

19 1. On or about December 1, 2021, claimant Maldonado Ceja filed a claim in the administrative
20 forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately
21 \$25,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on September 2, 2021.

22 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant
25 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.
26

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency

1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
2 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
3 That deadline is March 1, 2022.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to
5 May 2, 2022, the time in which the United States is required to file a civil complaint for forfeiture against
6 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be required
9 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
10 the defendant currency is subject to forfeiture shall be extended to May 2, 2022.

11 Dated: 2/28/2022

PHILLIP A. TALBERT
United States Attorney

13 /s/ Kevin C. Khasigian
14 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

16 Dated: 2/28/2022

17 /s/ Robert L. Forkner
ROBERT L. FORKNER
Attorney for potential claimant
Jesus Pedro Maldonado Ceja

18 (As authorized via email)

20
21 IT IS SO ORDERED.

22 Dated: **March 3, 2022**

23 
24 UNITED STATES DISTRICT JUDGE